

1 **THIERMAN BUCK**

2 Joshua D. Buck, Nev. Bar No. 12187
3 josh@thiermanbuck.com
4 Leah L. Jones, Nev. Bar No. 13161
5 leah@thiermanbuck.com
6 325 W. Liberty Street
7 Reno, Nevada 89501
8 Tel. (775) 284-1500
9 Fax (775) 703-5027

10 *Attorneys for Plaintiff
11 and the Putative Classes*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 ATAVIAOUS WILLIAMS, on behalf of
15 herself and all other similarly situated
16 individuals,

17 Plaintiff,

18 vs.

19 THE HERTZ CORPORATION; and
20 DOES 1 through 50, inclusive,

21 Defendant(s).

22 Case No.: 2-25-cv-00017-RFB-EJY

23 **STIPULATION FOR EXTENSION OF
24 TIME TO FILE PLAINTIFF'S
25 OPPOSITION TO DEFENDANT'S
26 MOTION FOR SUMMARY JUDGMENT,
27 OR, IN THE ALTERNATIVE, TO
28 COMPEL ARBITRATION AND
 CORRESPONDING EXTENSION OF
 TIME FOR DEFENDANT'S REPLY AND
 [PROPOSED] ORDER THEREON**

29 **(First Request)**

30 Plaintiff ATAVIAOUS WILLIAMS ("Plaintiff"), by and through her counsel of record
31 THIERMAN BUCK, and Defendant THE HERTZ CORPORATION ("Defendant", collectively
32 the "Parties"), by and through their counsel of record, BROWNSTEIN HYATT FARBER
33 SCHREK, LLP and WINSTON & STRAWN LLP, hereby stipulate and request a seven-calendar
34 day extension of time, up to and including Friday, May 16, 2025, for Plaintiff's Opposition to
35 Defendant's Motion for Summary Judgment, or, in the alternative, to Compel Arbitration. (ECF
36 No. 20) and a corresponding seven-calendar day extension of time, up to and including Friday,
37 May 30, 2025, for Defendant's Reply in support of Defendant's Motion for Summary Judgment,

1 or, in the alternative, to Compel Arbitration. (ECF No. 20).

2 This is Plaintiff's first request for an extension of time to file her Opposition.

3 Plaintiff requests this extension of time in order to review Defendant's responses to
4 Plaintiff's written discovery responses, as well as to accommodate attorney and staff previously
5 planned absences. This Stipulation is made in good faith and not for the purposes of undue burden
6 or delay.

7 Dated: April 24, 2025

8 THIERMAN BUCK

9 /s/ Leah L. Jones

10 Joshua D. Buck, Nev. Bar No. 12187
11 Leah L. Jones, Nev. Bar No. 13161
12 325 W. Liberty St.
13 Reno, Nevada 89501

14 Attorneys for Plaintiff
15 and the Putative Classes

Dated: April 24, 2025

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

/s/ Tristan R. Kirk

Travis S. Chance, Nev. Bar No. 13800
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106

WINSTON & STRAWN LLP
Laura R. Petroff, *Pro Hac Vice*
Tristan R. Kirk, *Pro Hac Vice*
333 S. Grant Avenue, 38th Floor
Los Angeles, CA 90071-1543

Attorneys for Defendant The Hertz
Corporation

20 ORDER

21
22 IT IS SO ORDERED.

23
24 
RICHARD F. BOULWARE, II
25 UNITED STATES DISTRICT JUDGE

26 DATED: This 25th day of April, 2025.
27